



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

July 10, 2017

VIA ECF

Hon. William H. Pauley III
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Courtroom 20B
New York, New York 10007

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Re: *Stephen Beach v. HSBC Bank USA, N.A.*
No. 17 Civ. 5153 (WHP)

Your Honor:

We represent HSBC Bank USA, N.A. (“HSBC”) in the above-referenced lawsuit, which HSBC removed to this Court from New York State Supreme Court, New York County on July 7, 2017. (Dkt. 1.) In accordance with Your Honor’s Individual Practice I(D), we write to respectfully request a 21-day extension of time—through August 4, 2017—to answer or to file a letter requesting a pre-motion conference for a motion to dismiss the Complaint. The information required by Your Honor’s rules is as follows:

1. The original due date, in accordance with Federal Rule of Civil Procedure 81(c)(2)(C), is July 14, 2017.
2. The reason for the proposed extension of time is because we were retained in late June and are currently investigating the allegations in the Complaint.
3. There have been no previous requests for an adjournment or extension of time.
4. Plaintiff consents to this request.

For the foregoing reasons, HSBC respectfully requests an extension of time through August 4, 2017 to file an answer or to file a letter requesting a pre-motion conference for a motion to dismiss the Complaint.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'ASB', is written over a faint, light blue rectangular background.

Allan S. Bloom

ASB

cc: Christopher P. Milazzo, Esq.
Attorneys for Plaintiff